

**VIA ECF**

June 2, 2022

The Honorable James R. Cho  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Barker v. Rokosz, et al.*, 19 Civ. 00514 (KAM) (JRC)

Dear Judge Cho:

My office, along with Richman Law & Policy, represents Plaintiff Carla Barker in the above-referenced action. We write jointly with Defendant Steven Legum to submit a joint status report per the Court's May 2, 2022 Minute Entry.

**Plaintiff's Position:**

After Mr. Legum prepared and sent a draft settlement agreement on May 3, counsel for the defendants in the related state court action brought by Mr. Legum (the "State Counsel")<sup>1</sup> immediately informed Mr. Legum that, due to several complexities in the state court litigation and settlement process (including the number of parties, including parties that are themselves attorneys, the number of counsel involved, and other issues), they would appreciate preparing the first draft of the settlement agreement, which would contain certain necessary provisions that Mr. Legum had not included. State Counsel intends to send Mr. Legum the draft settlement agreement either today or tomorrow, after which the parties will need additional time to negotiate and finalize the settlement agreement. Accordingly, Plaintiff respectfully requests an additional 30 days to finalize the settlement agreement in this case and submit either a stipulation of dismissal or another joint status report.

**Defendant Legum's Position:**

The day after the Court was advised that the matter was settled, May 3, 2022, a draft settlement agreement was prepared and forwarded to counsel in the state court action, together with a request for comments. Not having heard, a follow-up email was sent on May 10, 2022, to which counsel responded that they "are working on a draft."

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<sup>1</sup> State Counsel includes three different sets of counsel: one for Mobilization for Justice and its attorneys, one for Richman Law Group and its attorneys, and one for Ms. Barker.

Not having heard thereafter, another follow-up was sent on May 20, to which counsel responded that they were busy and that a response would be forthcoming. No response has been forthcoming until yesterday, after a proposed joint status report was provided to counsel.

In light of the circumstances, a thirty-day extension is inordinately long and will undoubtedly just lead to further elongation of these proceedings.

Respectfully Submitted,

/s/ Michael N. Litrownik

Michael N. Litrownik

/s/ Steven G. Legum

Steven G. Legum

cc: All Counsel of Record (by ECF)